



217/782-6762

Refer to: 2010300032 -- Winnebago County
Rockford/Rockford Products Plant #2
ILD 000805895
Part A Log A033, Received March 24, 1986
RCRA - Permit

EPA Region 5 Records Ctr.



393436

February 18, 1988

Rockford Products Corporation - Plant #2
Attention: Mr. Roy Morris
707 Harrison Avenue
Rockford, Illinois 61108-7197

Dear Mr. Morris:

This letter refers to the following correspondence regarding withdrawal of Rockford Products' Part A Application:

7/18/85 letter from Harold W. Nail to Karl J. Klepitsch
11/4/85 letter from Harold W. Nail to Karl J. Klepitsch
7/30/86 letter from Harold W. Nail to Lawrence W. Eastep

These letters request the withdrawal of tank storage (S02), tank treatment (T01), other treatment (T04), and container storage (S01), from the facility's Part A Application.

Due to the following deficiencies, this request has been disapproved.

1. The facility's Part A Application indicates that the container storage consists of a 1,000 gallon unit. IEPA inspections of the facility describe a three cubic yard container (dumpster) for wastewater treatment sludge and a drum storage area with a capacity of approximately 13,500 gallons, the latter unit being closed in accordance with a closure plan which was approved January 7, 1986 (Log No. C-117). The July 30, 1986 letter to Lawrence Eastep states that the barrel storage unit for which Rockford Products seeks withdrawal from their Part A is a new oil (product) storage unit.

Before the container storage issue can be resolved, the following issues must be addressed:

- a. Identify the locations, capacities, container types, and wastes (or products) stored in the container storage areas which Rockford Products has operated at Plant #2.
- b. Have hazardous wastes been stored in any of these container storage areas for longer than 90 days after November 19, 1980?



2. The Part A Application identifies two tank storage areas at the facility, with capacities of 1,000 gallons and 6,000 gallons, but doesn't indicate which unit is which on the provided map.

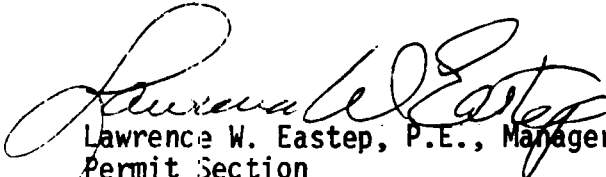
During the closure of a container storage area, an Agency inspection revealed that leakage from the west tank storage area had caused soil contamination within its containment area and had also leaked into the container storage unit which was being closed. Decontamination of the tank area was discussed but apparently not completed.

Before tank storage (S02) can be withdrawn from the Part A, the following issues must be addressed:

- a. Identify the location, type, number, capacities, current and past use (i.e., materials stored in each tank).
 - b. Decontamination of soil and equipment around the west tank storage unit must be conducted in accordance with Agency criteria and guidance.
3. The tank treatment (T01) units which are reported to be part of a wastewater treatment unit have not been described. A detailed description of these units along with a site location map and the justification for their withdrawal from the Part A should be provided.

If you have questions regarding this matter, please contact Bob Carson of my staff at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:RAC:ct/365j,1-2

cc: Rockford Region
Division File - RCRA Permit
Financial Assurance Unit
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy
Compliance Monitoring Section
Bob Carson